

### REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed February 17, 2009. Applicant respectfully requests reconsideration and favorable action in this case.

#### Claims Status

Claims 1-5, 8, 10-20, 23, 25-35, 38 and 40-50 were pending. Claims 1-5, 8, 10-20, 23, 25-35, 38 and 40-50 were rejected. Claims 1-2, 4-5, 10-11, 16-20, 23 and 31-35 are amended herein. Support for the amendments may be found at least in paragraphs 75, 81, 84 and 92. No new matter is added. Claims 3 and 38 were previously presented. Claims 6-9, 12-15, 21-22, 24-30, 36-37 and 39-53 are canceled. No claims are added. Thus, by this amendment, claims 1-5, 10-11, 16-20, 23, 31-35 and 38 remain pending.

#### Interview Summary

Pursuant to Applicant Initiated Interview Request submitted April 16, 2009, a telephonic interview was conducted on April 29, 2009 between Examiner Ted Vo, inventors Clint Miller, Mark Castoe and Ray Renteria and Agent Kevin Gust. During the interview, the claims and the cited references were discussed. Applicant appreciates the time and effort taken by Examiner Vo to review Applicant's present application and discuss the pending claims and the cited prior art.

#### Rejections under 35 U.S.C. § 112

Claims 31-35, 38 and 40-45 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 31-35 and 38 are amended and claims 40-45 are canceled. Accordingly, Applicant believes the rejection is now moot.

#### Rejections under 35 U.S.C. § 101

Claims 31-35, 38 and 40-45 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claims 31-35 and 38 are amended and claims 40-45 are canceled. Accordingly, Applicant believes the rejection is now moot.

Rejections under 35 U.S.C. § 103

Claims 1-5, 8, 10-20, 23, 25-35, 38 and 40-45 were rejected under 35 U.S.C. §103(a) as being unpatentable over “*Database Design for Smarties Using UML for Data Modeling*” by Robert Muller (“Muller”). The rejection is respectfully traversed.

Claim 1, as amended, recites:

A method of modeling an arbitrarily complex environment, comprising:  
defining, on a model computer, a schema having a plurality of types of data structures, wherein each data structure comprises one or more fields;  
storing, by a database computer, the schema in a static database, wherein the static database comprises a table for each type of data structure, wherein the plurality of types of data structures comprises components, relationships, properties and types; and  
representing, by a database connectivity computer, entities in the arbitrarily complex environment by assigning one or more values to the one or more fields in the database;  
wherein adding to or altering the data model further comprises the steps of :  
accessing, by a manager computer, the model computer, to add or alter a data structure; and  
storing, by the model computer, the added or altered data structure to the database, wherein the addition or alteration of components, relationships, properties and types do not change the defined data structures or the schema.

In the rejection, the Examiner states that Muller discloses a method for modeling an arbitrarily complex environment. Applicant submits that Muller teaches a static system, in which an arbitrarily complex environment may be modeled, but that requires a large amount of subsequent coding and/or recoding to accommodate changes to the environment. In contrast, embodiments disclosed by Applicant are able to dynamically accommodate changes to a complex environment such that the schema does not need to be changed. Thus, after an environment has been modeled and stored, changes to the model may be accomplished by a manager computer accessing the model computer to add or alter a data structure and then storing the added or altered data structure to the database, wherein the addition or alteration of components, relationships, properties and types do not change the defined data structures or the schema. Advantageously, because the defined data structures and the schema do not change, code required to interact with them also does not need to be changed.

Conclusion

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-5, 10-11, 16-20, 23, 31-35 and 38. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

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